



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Aida Garcia
DOCKET NO.: 21-51158.001-R-1
PARCEL NO.: 13-35-236-002-0000

The parties of record before the Property Tax Appeal Board are Aida Garcia, the appellant, by attorney Ciarra J. Schmidt, of Schmidt Salzman & Moran, Ltd. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$9,375
IMPR.: \$33,905
TOTAL: \$43,280

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2021 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a 2-story building of masonry exterior construction with 3,324 square feet of building area. The dwelling is approximately 131 years old. Features of the building include a basement with an apartment, central air conditioning and a 2-car garage. The property has an approximately 3,125 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted five equity comparables that are located in the same assessment neighborhood code as the subject property. The appellant reported that the comparables are improved with class 2-11, 2-story or 3-story buildings of frame, masonry or frame and masonry exterior construction that range in size from 3,018 to 3,571 square feet of building area. The buildings range in age from 113 to 133 years old. Four comparable each have a basement, three with finished area and one with an apartment, one

comparable has a concrete slab foundation. Two comparables each have an attic with finished area and one comparable has a 2-car garage. The comparables have improvement assessments that range from \$19,689 to \$23,625 or from \$6.52 to \$6.71 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$22,004 or \$6.62 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$43,280. The subject property has an improvement assessment of \$33,905 or \$10.20 per square foot of building area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same assessment neighborhood code as the subject property. The board of review reported that the comparables are improved with class 2-11, 2-story or 3-story buildings of frame or masonry exterior construction that range in size 3,375 to 3,497 square feet of building area. The buildings range in age from 98 to 113 years old. Each comparable has a basement, one with finished area and two with an apartment. One comparable has central air conditioning. Each comparable has either a 1-car or a 2-car garage. The comparables have improvement assessments that range from \$50,550 to \$64,550 or from \$14.69 to \$18.46 per square foot of building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains nine suggested equity comparables for the Board's consideration. The Board has given less weight to appellant's comparable #2 as well as board of review comparable #2 due to their dissimilar design. The Board has given reduced weight to appellant's comparables #3, #4 and #5 due to their finished attics, a feature the subject lacks.

The Board finds the best evidence of assessment equity to be appellant's comparable #1 along with board of review comparables #1, #3 and #4. The Board finds that these comparables are most similar to the subject in location, design, dwelling size and some features. However, the appellant's comparable lacks central air conditioning and the board of review comparables are each younger in age, suggesting adjustments would be required to make the comparables more equivalent to the subject. These most similar comparables have improvement assessments ranging from \$19,689 to \$64,550 or from \$6.52 to \$18.46 per square foot of building area. The subject's improvement assessment of \$33,905 or \$10.20 per square foot of building area, falls within the range of the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the

appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member

Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: January 21, 2025



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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